

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

FLEXIWORLD TECHNOLOGIES, INC.,

Plaintiff,

v.

ROKU, INC.,

Defendant.

Case No. 6:20-cv-00819-ADA

NOTICE OF AGREED EXTENSION OF DEADLINES

Plaintiff Flexiworld Technologies, Inc. hereby notifies the Court that the parties have agreed to extensions of the deadlines for (1) the parties' opening expert reports, and (2) Plaintiff's response to Defendant Roku, Inc.'s motion for judgment on the pleadings, filed December 30, 2021. Specifically, the parties have agreed to extend the deadline for their opening expert reports from January 6, 2022 to January 13, 2022, and to extend the deadline for Plaintiff's response to Roku's motion for judgment on the pleadings from January 13, 2022 to February 4, 2022. The parties have further agreed to provide Defendant Roku with an additional week, to February 18, 2022, to file its reply to its motion for judgment on the pleadings.

Pursuant to the Court's August 11, 2021 "Standing Order Regarding Joint or Unopposed Request to Change Deadlines," Plaintiff is filing this notice rather than an unopposed motion or stipulation.

The extended deadline for opening expert reports will provide additional time for the parties to complete document production pursuant to the Court's January 3, 2022 ruling following a discovery hearing on that day, to complete additional formal and informal discovery related to outstanding requests from the parties' meet-and-confers, and to prepare opening expert reports

addressing that formal and informal discovery. Similarly, the extended deadline for Plaintiff's response to Roku's motion for judgment on the pleadings, and Defendant's reply thereto will allow time for the parties to complete expert discovery before completing briefing on the motion.

Counsel for Plaintiff has conferred with counsel for Defendant, and the Plaintiff does not oppose this change.

Dated: January 4, 2022

Respectfully submitted,

/s/ Timothy E. Grochocinski

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COUNSEL FOR PLAINTIFF

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on counsel for Defendant via email on January 4, 2022.

/s/ Timothy E. Grochocinski